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July 8, 2014

**Via ECF**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Durov, et al. v. Sherbovich, et al., No. 14 Civ. 3063 (LGS)

Dear Judge Schofield:

We represent defendant David Axel Neff in the above-referenced action.

By letter dated July 7, 2014 (the "July 7 Letter"), defendants Digital Fortress LLC ("Digital Fortress"), Telegram LLC and Pictograph LLC requested a pre-motion conference with regard to leave to move for a motion for a protective order regarding the noticed 30(b)(6) deposition of Digital Fortress. As noted in the July 7 Letter, Mr. Neff would likely be designated as the 30(b)(6) witness for Digital Fortress. Accordingly, Mr. Neff joins in the request for a pre-motion conference for the reasons set forth in the July 7 Letter.

Respectfully,



Andrew C. Levitt

cc: All Counsel of Record